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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JOVITA SALVADOR,

Plaintiff,

vs.

CAPITAL ONE, INC., CAPITAL ONE  
AUTO FINANCE., NORDSTROM, INC.,  
WELLS FARGO HOME MORTGAGE,  
INC., and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

CASE NO. 2:15-cv-01200-APG-NJK

**STIPULATION AND PROPOSED  
ORDER TO FILE AMENDED  
COMPLAINT**

Plaintiff Jovita Salvador (“Plaintiff”) and Defendant Wells Fargo Bank, N.A., erroneously named as Wells Fargo Home Mortgage (“Wells Fargo,” together with Plaintiff, the “Parties”), by and through their respective attorneys, hereby stipulate to allow Plaintiff to file First Amended Complaint (“FAC”) as follows:

WHEREAS, on June 24, 2015, Plaintiff filed her Complaint;

1 WHEREAS, on January 25, 2016, Plaintiff filed her Motion to Amend/Correct Complaint,  
2 ECF No. 40 (“Motion”);

3 WHEREAS, the Parties agree to allow Plaintiff to file the amended complaint, attached  
4 hereto as Exhibit A, rendering the Motion moot;

5 WHEREAS, Wells Fargo is the only remaining defendant in this case as Plaintiff has  
6 substantively settled with Nordstrom;

7 WHEREAS, the deadline to dismiss Nordstrom as a defendant is March 30, 2016;

8 WHEREAS, this request is not made for purposes of delay and is supported by good  
9 cause;

10 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
11 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

- 12 1. The Motion is withdrawn;
- 13 2. Plaintiff shall file the Amended Complaint, attached hereto as Exhibit A, within  
14 five days of this Court’s Order;
- 15 3. Wells Fargo shall file a response to the Amended Complaint within thirty (30)  
16 days thereafter.

17 **IT IS SO STIPULATED.**

18 DATED March 9, 2016.

19 KAZEROUNI LAW GROUP, APC

SNELL & WILMER L.L.P.

21 By: /s/ Michael Kind  
22 Michael Kind, Esq.  
23 Nevada Bar No. 13903  
24 7854 W. Sahara Avenue  
25 Las Vegas, Nevada 89117  
26 *Attorneys for Plaintiff*

By: /s/ Karl O. Riley  
Karl O. Riley, Esq.  
Nevada Bar No. 12077  
3883 Howard Hughes Parkway, Suite 1100  
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*Attorneys for Defendant Wells Fargo  
Bank, N.A. erroneously named as Wells  
Fargo Home Mortgage*

**ORDER**

**IT IS ORDERED THAT** the Motion to Amend/Correct Complaint, ECF No. 40, is hereby withdrawn;

**IT IS FURTHER ORDERED THAT** Plaintiff shall file the Amended Complaint, <sup>one day</sup> attached hereto, within ~~five days~~ of this Order.

**IT IS FURTHER ORDERED THAT** Wells Fargo shall file a response to the Amended Complaint within <sup>14 days</sup> ~~thirty (30) days~~ thereafter.

**IT IS SO ORDERED.**

DATED: March 10, 2016.

  
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UNITED STATES MAGISTRATE JUDGE